

EXHIBIT 2.2

DEFENDANTS' WITNESS LIST

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

**THE TRUSTEES OF PURDUE
UNIVERSITY,**

Plaintiff,

vs.

**STMICROELECTRONICS
INTERNATIONAL N.V. and
STMICROELECTRONICS, INC.,**

Defendants.

Civil Action No. 6:21-CV-00727-ADA-DTG

JURY TRIAL DEMAND

DEFENDANTS' WITNESS LIST

Pursuant to the Second Amended Scheduling Order (Dkt. 241), and consistent with this Court's Amended Standing Order on Pretrial Procedures and Requirements in Civil Cases, Defendants STMicroelectronics International N.V. and STMicroelectronics, Inc. (collectively, "Defendants") hereby submit the following Witness List for identification and categorization of trial witnesses.

This list is not a commitment that Defendants will call any particular witness at trial, or a representation that any of the witnesses listed are available or will appear for trial. If any witness listed as a person Defendants intend to call to testify live is unavailable, Defendants reserve the right to present such witness by deposition. If any witness listed as a person whom Defendants intend to call to testify live is not available to appear in person, Defendants reserve the right to call such witness to testify remotely.

Defendants reserve the right to cross-examine and/or impeach any witness called by Plaintiff. Defendants reserve the right to call undesignated rebuttal witnesses, whose testimony

cannot be reasonable foreseen until the presentation of Plaintiff's evidence against Defendants, if any. Defendants reserve the right to supplement and amend the following list as the Court and Federal Rules allow.

Defendants reserve the right to call their witnesses in any order and for any amount of time within their allotted time.

Defendants reserve the right to call any witness on Plaintiff's witness list. Defendants further note that their identification of any witness listed herein is not an admission that the witness's testimony would be admissible into evidence if proffered by Plaintiff and Defendants reserve the right to withdraw or choose not to call any witness identified herein, and object if Plaintiff attempts to call them.

At this time, Defendants identify the following witnesses and experts for trial.

Witness Name	Will Call	May Call	Live	By Deposition	Estimated Time
Mario Saggio	X		X		1.0
Dean Neikirk	X		X		1.5
Andrea Tranchida		X	X		0.0
Alfredo Arno		X	X		0.0
Jeffrey Fedison	X		X	X	0.2
Ginger Turner	X		X	X	0.2
Karl Straatveit		X	X		0.0
Antonio Grimaldi		X	X		0.0
Rino Peruzzi		X	X		0.0
Roberto Bisazza		X	X		0.0
Jeffrey Halbig		X	X		0.0
Angelo Castorina		X	X		0.0
Sylvia Hall-Ellis	X		X		0.4
Lori Lipkin	X		X		1.5

Ken Waite ¹	X		X	X	0.25
Steven Schultz	X		X	X	0.25
Ljubisa Stevanovic	X			X	0.25
Matt Halladay	X		X	X	0.25
Frank Ravazi		X		X	0.0
Michael Shore	X		X		0.5
Tammy Metzinger		X		X	0.0
Ken Sandel		X		X	0.0
Stephen Becker	X		X		1.25
Glen Kellett	X			X	0.25
James Cooper	X		X	X	0.75
Asmita Saha	X		X	X	0.2

¹ Defendants note that Mr. Waite, Mr. Halladay, and Dr. Cooper were deposed as Plaintiff's Rule 30(b)(6) representatives. Defendants thus reserve the right to present their testimony via deposition even if they appear live to testify.

Dated: August 15, 2023

Respectfully submitted,

By: /s/ Michael D. Hatcher

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**ATTORNEYS FOR DEFENDANTS
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STMICROELECTRONICS, INC.**

CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify that a true and correct copy of the foregoing document was served on all parties to this action via electronic mail on August 15, 2023.

/s/ Michael D. Hatcher

Michael D. Hatcher